

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
ALEX LEVIN,)
Defendant.)
CRIMINAL NO. 15-MJ-10271-WGY

MOTION FOR DISCOVERY PROTECTIVE ORDER

The United States of America, by and through the undersigned Assistant United States Attorney, files this motion for entry of a discovery protective order.

Defendant Alex Levin was charged by indictment with possession of child pornography, in violation of 18 U.S.C. § 2252A. Discovery materials that the government intends to produce in response to the Court's Order on the Defendant's Motion to Compel [Doc. 144] include items of a sensitive nature, including raw NIT results.

The government requests that the Court issue a protective order which would prohibit the defendant from disseminating—without prior approval from the Court—the discovery materials designated as “sensitive” to anyone other than counsel and members of the defendant’s litigation and investigative team, as defined in the attached proposed order. The government further requests that the Court require counsel for the defendant to return materials produced pursuant to the protective order within 10 days of the conclusion of the case before this Court.

Any materials produced pursuant to the proposed protective order that are filed with the Court in connection with pre-trial motions, trial, sentencing, or other matters before this Court

shall be filed under seal and shall remain sealed until otherwise ordered by this Court. This does not entitle either party to seal their filings as a matter of course. The parties are required to comply in all respects with the relevant local and federal rules of criminal procedure pertaining to the sealing of court documents.

The government has conferred with counsel for the defendant, who assents to this motion and stipulates to the attached proposed order.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Anne Paruti
Anne Paruti
Assistant U.S. Attorney

GRANTED on _____.

Honorable William G. Young
United States District Judge

Certificate of Service

I hereby certify that a true copy of this motion was served upon the attorney of record by email and via the ECF system.

/s/ Anne Paruti
Anne Paruti
Assistant United States Attorney